REMARKS

In response to the Office Action mailed December 8, 2005, Applicants respectfully request reconsideration. Claims 1-5 were previously pending in this application. Claims 1, 2 and 4 have been amended solely for the purpose of clarification. New claims 5-29 have been added to more fully define Applicants' contribution to the art. No new matter has been added.

Allowable Subject Matter

Applicants note with appreciation the indication of allowable subject matter in claim 3.

Objections to the Specification

The Office Action objected to the specification under MPEP 608.01(m), stating that "each claim must be the object of a sentence starting with 'I (or we) claim' 'The invention claimed is' (or the equivalent." Applicants respectfully point out that Page 7, Line 8 of the specification states "What is claimed is:" and the claims appear on the following pages. Applicants submit that the phrase "what is claimed is:" is equivalent to the above phrases cited in the Office Action. Accordingly, withdrawal of this objection to the specification is respectfully requested.

Rejections under 35 U.S.C. §103(a)

The Office Action rejected claim 1 under 35 U.S.C. §103(a) as being unpatentable over Richards (US 006756976 B2) in view of Glennon (US 006359654 B1). The Office Action rejected claims 2, 4 and 5 under 35 U.S.C. §103(a) as being unpatentable over Richards (US 006756976 B2) in view of Glennon (US 006359654 B1) and further in view of Leung (US 005900887 A). Applicants respectfully traverse these rejections. Applicants respectfully disagree that there exists motivation to combine the references. However, the motivation to combine the references will not be discussed further herein because the claims distinguish over references either alone or in combination. Applicants reserve the right to raise this issue at a later time.

I. Discussion of Cited References

Richards describes displaying images using a spatial light modulator (col. 1, lines 31-37). FIG. 4 illustrates an example of a PWM waveform 100 having segments 102a-102d. Waveform 100 is a four-bit binary waveform that enables displaying 16 different levels of grayscale, depending on the segments that are activated. Activating longer segments 102a-102d increases the pixel intensity that is displayed (col. 10, lines 13-32). FIG. 5 illustrates that the PWM timing waveforms for different rows are staggered in time to even out the amount of data traffic on the display bus (col. 10, lines 43-50). FIG. 6 illustrates a different method of staggering in time the waveforms of the different rows, in which the waveforms of the rows are offset in time based on certain criteria (col. 11, lines 20-50). Thus, Richards describes displaying an image and staggering the timing of the signals used to display the image.

Glennon et. al describes methods to display interlaced video on non-interlaced monitors (Abstract). Leung et al. describes a graphics controller chip with an integrated graphics memory (Abstract).

II. The Claims Distinguish Over the References

Claim 1 as amended recites, *inter alia*:

> (e) for each row address of the frame memory, activating pixels of a screen line associated with said address offset by a same **pixel position offset value**, based on the read states of the row associated with said address, and/or activating pixels of a screen line associated with said row address based on the read states of the frame memory row associated with said address offset by a same **pixel position offset value**.

Claim 1 patentably distinguishes over Richards and Glennon et al. because neither Richards nor Glennon teaches or suggests activating pixels of a screen line associated with said address offset by a same pixel position offset value or activating pixels of a screen line associated with said row address based on the read states of the frame memory row associated with said address offset by a same pixel position offset value. Rather, as discussed above, Richards describes staggering in time the signals used to display an image. Glennon et al. fails to remedy these deficiencies. Therefore, claim 1 patentably distinguishes over Richards and Glennon either alone or in combination. Accordingly, withdrawal of this rejection is respectfully requested.

Claim 2 as amended recites, inter alia:

> a dedicated address circuit receiving the address of the row read by the read means and transmitting to the row driver a new address corresponding to the address of the read row offset by a same **pixel position offset value**, and/or a dedicated state circuit receiving the states of the points read by the read means and transmitting to the column driver new states corresponding to the read states offset by a same **pixel position offset value**.

Claim 2 patentably distinguishes over Richards, Glennon et al. and Leung et al. because none of these references teaches or suggests a dedicated address circuit receiving the address of the row read by the read means and transmitting to the row driver a new address corresponding to the address of the read row offset by a same **pixel position offset value,** or a dedicated state circuit receiving the states of the points read by the read means and transmitting to the column driver new states corresponding to the read states offset by a same **pixel position offset value**. Again, Richards describes staggering in time the signals used to display an image. Glennon et al. and Leung et al. fail to remedy these deficiencies. Therefore, claim 2 patentably distinguishes over Richards, Glennon et. al. and Leung et. al. either alone or in combination. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 3-5 depend from claim 2 and are therefore patentable for at least the same reasons. Accordingly, withdrawal of these rejections is respectfully requested.

New Claims

New claim 6 recites:

> A method of displaying images using pixels, the method comprising:
> selectively activating the pixels to display a first image on a screen;
> **determining whether a second image to be displayed after the first image is substantially similar or identical to the first image;** and
> if the second image is substantially similar or identical to the first image, selectively activating the pixels to display the second image so that **at least a portion of the second image is displayed offset in position on the screen from the position in which the first image was displayed.**

Claim 6 patentably distinguishes over Richards, Glennon et al. and Leung et al. because none of these references teaches or suggests determining whether a second image to be displayed after the first image is substantially similar or identical to the first **image** and selectively activating

the pixels to display the second image so that at least a portion of the second image is displayed offset in position on the screen from the position in which the first image was displayed.

Claims 7-17 depend from claim 6 and are therefore patentable for at least the same reasons.

New claim 18 recites:

A device for displaying an image, comprising:
at least one first circuit that activates pixels to display the image; and
at least one second circuit that determines whether the image is a substantially similar or identical image to a previously displayed image and, if so, **provides position offset information to the at least one first circuit such that the image is displayed in an offset position** with respect to the position at which the previously displayed image was displayed.

Claim 18 patentably distinguishes over Richards, Glennon et al. and Leung et al. because none of these references teaches or suggests at least one second circuit that determines whether the image is a substantially similar or identical image to a previously displayed image and, if so, provides position offset information to the at least one first circuit such that the image is displayed in an offset position with respect to the position at which the previously displayed image was displayed.

Claims 19-29 depend from claim 18 and are therefore patentable for at least the same reasons.

CONCLUSION

A Notice of Allowance is respectfully requested. The Examiner is requested to call the undersigned at the telephone number listed below if this communication does not place the case in condition for allowance.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, applicant hereby requests any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to deposit account no. 23/2825.

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Respectfully submitted,

By _____

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